



E. STEWART

Jones Hacker Murphy LLP

ATTORNEYS & COUNSELORS AT LAW

28 SECOND STREET
TROY, NY 12180
PHONE: (518) 274-5820

7 AIRPORT PARK BOULEVARD
LATHAM, NY 12110
PHONE: (518) 783-3843

511 BROADWAY
SARATOGA SPRINGS, NY 12866
PHONE: (518) 584-8886

1659 CENTRAL AVENUE, SUITE 103
ALBANY, NY 12205
PHONE: (518) 486-8800

FAX: (518) 274-5875

www.joneshacker.com

PLEASE REPLY TO:
TROY OFFICE

March 30, 2020

VIA ECF FILING

Hon. Louis L. Stanton
United States District Court
Southern District Court
500 Pearl Street
New York, NY 10007-1312

Re: Ethereum Ventures, LLC v. Chet Mining, LLC, et al.
Index No.: 1:19-CV-07949-LLS
Our File No.: 8461.009

Dear Judge Stanton,

This firm represents the plaintiff in the above referenced breach of contract / fraud case.

As you may recall at the last conference, the defendants sent prospective counsel who “informally” appeared. Apparently, those attorneys were never been formally retained and the defendants are appearing *pro se*.

While I have reached out to the *pro se* defendants on multiple occasions to discuss the issues raised in the Court’s March 17, 2020 Order, I have not received a response. Thus, I write this letter to Your Honor.

The plaintiff brings action to recover damages for Bitcoin mining computer equipment it bought and paid for, but never delivered by the defendants. The plaintiff further seeks to pierce the corporate veil to hold Chet Stojanovich personally liable for the debt owing to the plaintiff.

A copy of the Defendants’ invoices to Plaintiff as well as proof of Plaintiff’s payment are attached hereto as Exhibit “A”.

Plaintiff expects to establish defendants’ pattern and practice of defrauding customers and respectfully refers to the Court of the two other cases filed by this law firm against the defendants: Andrew Schwartzberg v. Chet Mining Co., Inc. et al. Case No.: 1:20-cv-01880 and Amir Fardghassemi v. Chet Mining Co., Inc., et al. Case No.: 1:20-cv-02531. Both cases have similar fact patterns as this case before Your Honor.



March 30, 2020
Page 2

We anticipate being able to prove that Chet Stojanovich utilized Chet Mining Co., LLC as an instrument to commit fraud upon the plaintiff herein, and the plaintiffs in the aforesaid cases. We will seek to prove that Chet Stojanovich converted plaintiff's funds, using the same for his own personal gain and benefit.

One issue critical issue with this case's administration is the failure of the corporate defendant to be represented by counsel. It is respectfully submitted that the Court *sua sponte* order that the Corporate defendant appear via counsel within five (5) days or else be subject to entry of a default by the Clerk pursuant to FRCP 55(a). Alternatively, we anticipate making a motion to that effect.

Our proposed discovery schedule is contained in our prior correspondence to the Court found at Docket Number 21.

We would like an expedited discovery schedule so that an early motion for summary judgment can be made against the defendants.

I respectfully request the Court schedule a telephone conference to take place within the next ten (10) days to address the issues raised herein.

Very truly yours,

E. STEWART JONES HACKER MURPHY LLP

s/ John F. Harwick

John F. Harwick

jharwick@joneshacker.com

Direct Dial: (518) 213-0113

JFH:dmd

cc: Defendants (via e-mail & ECF filing)
Client

EXHIBIT “A”



Wire Transfer of Funds Notice

Outgoing Domestic Wire

Depository Account

ETHEREUM VENTURES LLC
270 CORNERSTONE DR STE 101
CARY, NC 27519-8400

Processing Date: 4/24/2019
Time: 2:14PM

The Following Information Was Sent For: Regular Transfer of Funds

Originator: ID#:
ETHEREUM VENTURES LLC-
JOHNPAL BARIC
270 CORNERSTONE DR STE 101
CARY, NC 27519-8400

Wire Amount: \$100,000.00
Wire Fee: \$15.00
Total: \$100,015.00

Beneficiary: ID#:
Chet Mining LLC
50 West Street Suite 29A
NEW YORK, NY 10006

Wire Charged To:
Fees Charged To:

IMAD:

Additional Wire Information:

Reference: Originator to Ben: Reference: Receiving Bank: JPMORGAN CHASE
BANK, NA Branch: 111

Payment for

Invoice Number	Invoice Date	Invoice Amount	Payment Amount
1002	24 Apr 2019	\$173,280.00	\$100,000.00



CHET MINING CO LLC

The future of Crypto Mining and Miners

Chet Mining LLC

50 West Street
Suite 29A
New York New York 10006
U.S.A
Company ID :
EIN

PAYMENT RECEIPT

Payment Date **26 Apr 2019**

Reference Number

Payment Mode **Bank Transfer**

Amount Received
\$100,000.00

Bill To

Ethereum Venture LLC

85 Broadway, 29th Floor, New York, NY 10006
Miningstore
6316C J Richard Dr
Raleigh, NC 27617
New York
10006 New York
U.S.A



CHET MINING CO LLC

The future of Crypto Mining and Miners!

WIRING INSTRUCTIONS

NOTE: MUST MAKE PAYABLE TO "Chet Mining LLC"

JPMorgan Chase Bank NA
270 Park Avenue
New York, NY 10017
USA

Federal Wire Routing/ABA number:
International Swift Code:

Credit to the Acc't of: **Chet Mining LLC**

Beneficiary Address: **50 West Street
Suite 29A
New York, NY 10006
USA**

Account #:

Reference: (Insert Invoice #)

Pls make sure all charges paid by sender.

Payment Made (-) 100,000.00

Balance Due \$73,280.00

Notes

Looking forward to our business, and your tax refund after st120 fill out, UPC

Terms & Conditions

25992.00 CCANtainers Taxes minus tax refund



Invoice

1002

CHET MINING CO LLC

The future of Crypto Mining and Miners

Chet Mining LLC

50 West Street
Suite 29A
New York New York 10006
U.S.A
Company ID :
EIN

Balance Due
\$73,280.00

Bill To

Ethereum Venture LLC

85 Broadway, 29th Floor, New York, NY 10006
Miningstore
6316C J Richard Dr
Raleigh, NC 27617
New York
10006 New York
U.S.A

Invoice Date : 24 Apr 2019
Terms : Due on Receipt
Due Date : 24 Apr 2019
P.O.# : OR1-1

#	Item & Description	Qty	Rate	Amount
1	Antminer S9 Miners Asurion/SquareTrade 399-499	912.00 box	6.99	6,374.88
2	Discoount refunded DOA 45 Days	1.00 912	-6,374.88	-6,374.88
3	Discoount refunded Shipping tax TN 8664.00 included not due.	1.00 912	-9,269.61	-9,269.61

#	Task & Description	Hours	Rate	Amount
4	S9i/j 13.5 -14.5 OC Capable 190 Per Unit taxes are 5% Tarrif CA plus 9.484375% NYC, New York Sales Tax.	912.00	190.00	173,280.00

Sub Total	164,010.39
Shipping TN (9.5%)	605.61
Canadian Tariff (5%)	8,664.00
Total	\$173,280.00